

ESTTA Tracking number: **ESTTA488643**

Filing date: **08/13/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91205211
Party	Plaintiff Atlanta National League Baseball Club, Inc.
Correspondence Address	SETH SHAFER COWAN LIEBOWITZ LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES trademark@cll.com, jmn@cll.com, sis@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Seth Shaifer
Filer's e-mail	sis@cll.com, trademark@cll.com, kco@cll.com
Signature	/Seth Shaifer/
Date	08/13/2012
Attachments	BRAVO Motion on Consent 081312.pdf (3 pages)(20240 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/361,205
Filed: May 21, 2012
For Mark: BRAVO
Published in the Official Gazette: May 21, 2012

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ATLANTA NATIONAL LEAGUE BASEBALL CLUB, INC.,	:	
	:	Opposition No. 91205211
Opposer,	:	
	:	
v.	:	
	:	
ARIZONA MANUFACTURING & EMBROIDERY, INC.,	:	
Applicant.	:	
	:	
-----X		

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of three (3) months, until **November 21, 2012**. Applicant’s counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made toward a resolution of this matter. Opposer’s outside counsel forwarded a draft agreement to Opposer’s in-house counsel for review. The additional time is requested for Opposer’s in-house counsel to review the agreement and provide comments to Opposer’s outside counsel, Opposer’s outside counsel to revise the draft accordingly, forward the draft to Applicant’s counsel for review, and for the parties to continue to pursue settlement. If

accepted, the settlement agreement would resolve this matter without the need to proceed with the opposition proceedings.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
August 13, 2012

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Seth Shaifer/

Mary L. Kevlin
Richard S. Mandel
Seth Shaifer
1133 Avenue of the Americas
New York, New York 10036
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 13, 2012, I caused a true and correct copy of the foregoing *Motion to Continuing Suspension* to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Adam R. Stephenson, Adam R. Stephenson, Ltd., 401 W. Baseline Rd., Ste. 207, Tempe, AZ 85283-5350.

/Seth Shaifer/
Seth Shaifer